

IN THE UNITED STATES DISTRICT
COURT For the Middle District OF
Alabama Northern Division

RECEIVED

2007 FEB 13 A 11:45

DEBRA P. HACKETT, CLK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

Berrah E Campbell IF

VS

United Parcel Service INC
Defendant

Civil ACTION

2:06-CV-205-WHA-CSC

MOTION TO DENY DEFENDANT CLAIM FOR SUMMARY JUDGEMENT.

As stated in the original complaint I was blackballed for standing up to a management person who was prejudiced and mistreated me by yelling and telling me I had better be afraid like a motherfucker. In my last days at the defendant employer I scheduled two days off which were scheduled well in advance were cancelled at the last minute by my then manager Burt Flood. I went ahead and took the days off anyway and when I returned for work Richard Quincy pushed a termination notice in my face. I refused to sign and handed in a resignation notice. I should have received a cash payout of my retirement but did not. I am asking for reinstatement to my former position as supervisor if the judge finds that there was no wrongdoing on behalf of the employer. I was a fifteen-year veteran.

Berrah E Campbell IF

Bert Flood IF 2-13-06

CERTIFICATE OF SERVICE

I hereby certify that on this ^{13th}~~14th~~ day of February, 2007, a copy of this

Motion to deny summary judgement

was mailed, postage prepaid, to

William J. Barby, Lisa Helen Casilly, Donald Randolph James Jr,

Jeremy Dean Tucker

Donah E. Campbell II
PRO SE LITIGANT